

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	Honorable Marianne O. Battani
In Re: Wire Harness Cases	:	Honorable Mona Majzoub
	:	
	:	Case: W:12-cv-10000-MON-MKB
THIS DOCUMENT RELATES TO	:	
	:	
ALL CASES	:	ORAL ARGUMENT REQUESTED
	:	

**AFFIDAVIT OF WARREN T. BURNS IN SUPPORT OF OPPOSITION TO
THE LEONI DEFENDANTS' MOTION TO DISMISS**

1. I, Warren T. Burns, being duly sworn, depose and State
2. I am over the age of twenty-one (21) years, am competent to testify to the matters stated herein, have personal knowledge of the facts and statements in this affidavit, and each of the facts and statements is true and correct.
3. According to a Leoni Press Release, the CRF Institute recognized Leoni as a top employer in Germany for the year 2011. Leoni was the best in allowing for career opportunities, Primary Benefits, Secondary Benefits and Work-Life Balance, Training & Development, and Corporate Culture. A true and correct copy of the Leoni report on being Germany's Top Employer 2011 is attached as **Exhibit A** to the affidavit.
4. According to the Leoni press release, The Center for Transportation & Logistics Neuer Adler e.V. (CNA) this year awarded its "Intelligence for Transportation and Logistics" innovation prize for the tenth time. The companies awarded on this occasion were Leoni and Continental, which jointly developed a high voltage power distributor for vehicles with electric drive. Dr Michael Frommberger, Head of Business Unit Electromobility, accepted the award for

Leoni. Helmut Fennel emphasised the pre-competitive collaboration as a key success factor. “Based on this collaboration we were able to take better account of the system aspects than in normal projects in which the mutual customer, the carmaker, stipulates the requirements.” Dr. Michael Frommberger also underscored this point: “In the case of electrical wiring system products the innovations are in the detail. And such detail development is best taken forward when, as in this case, a manufacturer of high voltage components and a wiring systems specialist collaborate at the pre-competitive stage. A true and correct copy of the July 12, 2012 media release; LEONI and Continental Awarded CNA innovation prize is attached as **Exhibit B** to the affidavit.

5. According to the Leoni 2006 annual report, The Wiring Systems division benefited in 2006 from the good order situation in the automotive industry and in the period under report and increased its external sales by nearly nine percent to EUR 954.2 million. The key factors were a larger volume of sales and the trend towards highly equipped premium-segment cars, which require more complex wiring systems. The additional sales and the correspondingly good capacity utilisation resulted, despite the persisting pressure on prices, in a slightly improved earnings situation. A true and correct copy of a 2006 Group Management Report; Wiring Systems is attached as **Exhibit C** to the affidavit.

6. According to the Analyst Meeting 2007 presentation by Dr. Klaus Probst, Dieter Bellé 2006 was a record year. Wiring systems accounted for 45% of group sales. Customers BMW, DaimlerChrysler, GM and Ford among mainstays of sales in 2006. Basis for full utilization of LEONI Wiring Systems’ capacity. The standard and special cables for the motor vehicle industry continued to be the most important group of customers in 2006. Substantial increase of sales, thus bolstering LEONI’s global market-leading position.

A true and correct copy of Analyst Meeting 2007 presentation by Dr. Klaus Probst, Dieter Bellé is attached as **Exhibit D** to the affidavit.

7. According to the August 16, 2012 Dun & Bradstreet report, Leoni, Manufactures electronic components, specializing in wire or cable harness assemblies. Provides management services. Wholesales electrical apparatus and equipment, specializing in wire and cable. A true and correct copy of an August 16, 2012 Dun & Bradstreet report for LEONI Wiring Systems, Inc. is attached as **Exhibit E** to the affidavit.

8. Martin Glöblein, Vice President Global R&D, LEONI was a highlighted speaker at the Econique Summit's speakers. A true and correct copy of the list of Econique Summit's speakers as of August 20, 2012 is attached as **Exhibit F** to the affidavit.

9. Martin Glöblein, Vice President Global R&D was a highlighted speaker at the Euroforum 15th Annual Electronic-Systems in Automobiles for the vehicle industry and electronic experts. His talk highlighted Managing complexity in the future - from the cable line up to complete wiring system; • Project management, development, production and logistics as success factors for a global company; • manage challenges to future electrical systems; Global structures and processes to implement and introduce. A true and correct copy of Euroforum 15th Annual Electronic-Systems in Automobiles for the vehicle industry and electronic experts; 2011 Agenda is attached as **Exhibit G**.

10. Highlights of LEONI's 2006 Annual Report (English version) include being bestowed by GM it's supplier of the year for the fourth time. According to the report they are the leading supplier of wires, cables and wire systems that constitute and "ascending value chain" A true and correct copy of LEONI's 2006 Annual Report (English version) is attached as **Exhibit H** to the affidavit.

11. According to LEONI's 2010 Annual Report (English version), they are Europe's Leading manufacture of wiring systems. A true and correct copy of LEONI's 2010 Annual Report (English version) is attached as **Exhibit I** to the affidavit.

12. Leoni states in the Terms for suppliers that any "Changes and deviations from these Terms must be made in writing." A true and correct copy of the Logistics Terms for Suppliers of LEONI Bordentz-Systeme GmbH (applicable for Suppliers of LEONI Wiring Systems Division) is attached as **Exhibit J** to the affidavit.

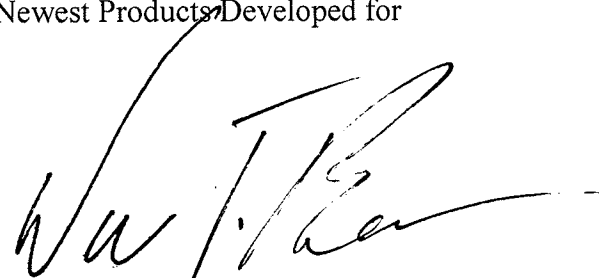
13. A true and correct copy of the webpage for LEONI Wiring Systems' material procurement & inventory management as of August 27, 2012 is attached as **Exhibit K** to the affidavit.

14. Highlighting their demands on supplies, to be "On time and in Full" A true and correct copy of LEONI Wiring Systems' webpage as of August 27, 2012 listing the North American locations is attached as **Exhibit L** to the affidavit.

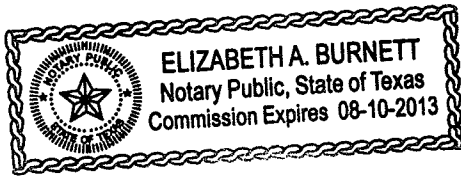
15. Highlighting Leoni's presence in North America. A true and correct copy of LEONI's USA "The Company" webpage as of August 27, 2012 is attached as **Exhibit M** to the affidavit.

16. A true and correct copy of LEONI Wiring Systems 2012 Corporate Annual Report is attached as **Exhibit N** to the affidavit.

17. Listing of Leoni's corporate divisions. A true and correct copy of Trailer | Body Builders' June 2000 news article headlined TTMA Associates Present Newest Products Developed for Trailers is attached as **Exhibit O** to the affidavit.


Warren T. Burns

SUBSCRIBED AND SWORN TO BEFORE ME on this 11th day of September, 2012, to certify which witness my hand and seal of office.



A handwritten signature in cursive script, appearing to read "Elizabeth A. Burnett", written over a horizontal line.

Notary Public in and for the State of Texas

My Commission Expires: 08.10.13